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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	2:11-CR-063-JCM-(CWH)
	)	
TONY AHN, et. al.	)	
	)	
Defendants.	)	

**UNITED STATES' UNOPPOSED MOTION TO CONTINUE DATE FOR THE  
 UNITED STATES TO FILE A RESPONSE TO PETITIONER'S CLAIM**

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant a seven-day continuance for the United States to file its response to the claim filed by National Union Fire Insurance Company in the above-captioned case. The United States' response is due by August 23, 2013.

After this Court signed the preliminary order of forfeiture in this case, the United States duly served all person/corporations that might have an interest in the forfeited properties. National Union filed a verified claim, stating that its interest in the forfeiture judgment arises out of a subrogation agreement that it has with its insured, MGM.

1 The Assistant United States Attorney assigned to the case has prepared a response to  
2 National Union's claim. The response is under review by the assigned Assistant's supervisor  
3 and that review may not be complete before expiration of the current deadline of August 23,  
4 2013. Therefore, the United States requests an additional seven days to complete supervisory  
5 review of this matter.

6 On August 23, 2013, Government counsel spoke by telephone with National Union's  
7 attorney, Robert Schumacher, who gave Government counsel his (Schumacher's) consent to  
8 inform this Court that he does not object to this motion.

9 This motion is not submitted solely for the purpose to delay or for any other improper  
10 purpose.

11 WHEREFORE, the United States moves this Court to grant a seven-day continuance,  
12 or until August 30, 2013, for the United States to file its response to National Union's claim  
13 of ownership filed in this matter.

14 DATED this 23rd day of August, 2013.

15 Respectfully submitted,

16 DANIEL G. BOGDEN  
17 United States Attorney

18 /s/Michael A. Humphreys  
19 MICHAEL A. HUMPHREYS  
20 Assistant United States Attorney

21  
22 IT IS SO ORDERED:

23  
24   
25 UNITED STATES DISTRICT JUDGE

26 DATED: August 27, 2013